

Teresa M. Shill, OSB # 031680
E-Mail: tshill@rcflegal.com
Routh Crabtree Olsen, P.C.
11830 SW Kerr Parkway, Ste. 385
Lake Oswego, Oregon 97035
Phone: (503) 977-7926
Fax: (503) 977-7963
Attorney For Defendant Federal
Deposit Insurance Corporation.

**UNITED STATES DISTRICT COURT
DISTRICT OF OREGON**

CORINNA-BRIDGETT, *in esse*, individually,
and as Agent for and on behalf of SALAL
PARK, INC., an Oregon non-profit corporation

Case No. 08CV-1072-HU

Plaintiffs

v.

WASHINGTON MUTUAL BANK, N.A.;
ROUTH CRABTREE OLSEN, P.C.: ALAN H.
FISHMAN; TERESA M. SHILL; NANCY E.
HOCHMAN; THOMAS W. KOHL; AND ROB
GORDON,

**DEFENDANT FEDERAL DEPOSIT
INSURANCE CORPORATION, AS
RECEIVER FOR WASHINGTON
MUTUAL BANK'S REQUEST FOR
ISSUANCE OF STAY**

Defendants.

Defendant, Federal Deposit Insurance Corporation, as Receiver of Washington Mutual Bank, N.A., by and through undersigned counsel, hereby respectfully requests a ninety day stay of all judicial actions or proceedings in the above-captioned matter. In support of this request, Appellant states as follows:

1. On September 25, 2008, the Office of Thrift Supervision declared Washington Mutual Bank insolvent, and appointed the Federal Deposit Insurance Corporation (the "Corporation") its Receiver. See Exhibit "A".

2. The Corporation accepted the appointment as Receiver pursuant to 12 U.S.C. Section 1821(c)(3)(A), and has been substituted in herein for defendant Washington Mutual Bank.

3. According to 12 U.S.C. Section 1821(d)(12)(A)(ii), the Receiver may request a stay for a period not to exceed ninety (90) days in any judicial action or proceeding to which the Receiver is or becomes a party.

4. If the Receiver requests a stay of any judicial action or proceeding in a court with competent jurisdiction, “. . . the court shall grant such stay as to all parties.” 12 U.S.C. Section 1821 (d)(12)(B).

DATED this 7th day of November, 2008

ROUTH CRABTREE OLSEN, P.C.

By /s/ Teresa M. Shill
Teresa M. Shill, OSB # 031680
Attorneys for the Federal Deposit Insurance
Corporation, as Receiver of Washington
Mutual Bank, N.A.
11830 SW Kerr Parkway, Ste. 385
Lake Oswego, Oregon 97035
(503) 977-7926; Fax (503) 977-7963
tshill@rcolegal.com